# DOCKET FILE COPY ORIGINAL

# Association for the Studies of American Heritage, Corporation. 293 JC Saunders Road Moultrie, GA. 31768

## PETITION FOR RULE MAKING Homerville, Georgia Channel 246A

The Following technical exhibit and statement has been prepared on behalf of Association for the Studies of American Heritage, Inc. (AFTSOAH) a Georgia domestic nonprofit corporation, incorporated on May 7, 2003. The purpose is a proposed rule making to allot channel 246A to Homerville, Georgia as that cities second radio service. AFTSOAH herby request the Commission institute a rule making proceeding to amend the table of allotments under Section 73.202(b). Within this proposal, AFTSOAH will demonstrate compliance with sections 73.207 (b)(1) and 73.315 if the Commissions rules.

### **Proposed City:**

Homerville, Georgia presently has one local service. The city is located in Clinch county, Georgia, is an incorporated city with a fully active city government. According to the 2000 Census data, The population of Homerville is 2,508 persons. Homerville has it's own elected mayor and city council members as well as it own US Post Office (31634) and many businesses and houses of worship.

## **Technical Spacing Concerns:**

Exhibit-1 is a spacing study from the proposed site. This exhibit shows short spacings to station WKQL, Jacksonville, Florida. Since WKQL is below the minimum for a full class C facility, this action proposes to down class WKQL from class C to C0. A complete study was conducted and no other channel was available for Homerville without the proposed down class of WKQL.

Offered, as exhibit-2, is a spacing study that shows the clear area once WKQL is reclassified as a C0 facilities.

#### **Proposed Site:**

Exhibit-3 is a plot showing the 70 dBu Contour and the city of Homerville. This exhibit clearly shows the entire city will be encompassed by the 70 dBu contour.

### Line-of-Site Study:

Exhibit-4 is a LOS plot showing the proposed city of license, homerville, and the proposed site. This exhibit is offered to show the Commissions staff there are no terrain concerns from the proposed site and the proposed city of license.

#### Persons Gained/Loss:

Total persons gained by proposal is 17,699 persons (exhibit-5A). Exhibit-5 is a visual plot showing the proposed 1.0 mV/M (60 dBu) contour, the population, and area within that contour. This exhibit clearly shows that the public interest would be better served by granting this proposal by adding new service to 17,699 persons. There would be no loss to WKQL by down classing to C0.

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### **Conclusion:**

It is concluded that channel 246A can be assigned to Homerville, Georgia in accordance with CFR section 73.207 of the Commissions rules and therefore should be granted.

Once channel 246A is assigned to Homerville, ASTSOAH. Inc. will file and application, or participate in the auction process, with the FCC, and once granted, will build and operate this facility.

Clyde Scott, Jr., President

Association for the Studies of American Heritage.

293 JC Saunders Road Moultrie, GA 31768 229-890-2506

### **CERTIFICATE OF SERVICE**

I, Connie Lee Scott, herby certifies that the forgoing document has been set by first class mail, postage prepaid, to the following on 11/11/2003.

WKQL Radio Cox Radio, Inc. 909 Hogan Road Jacksonville, FL. 32216

This is the address of record at the F.C.C. (See attached)

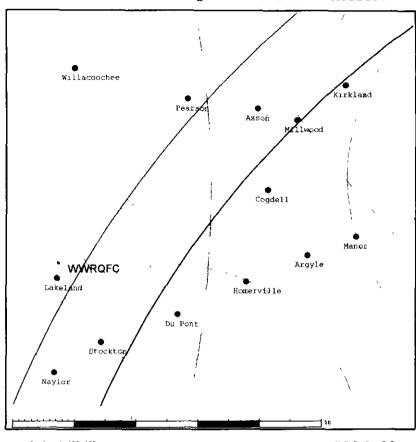
FMCONT(TM) LOCATE STUDY

# Ch 246 A 97.1 MHz

N. Lat. 31 07 27 W. Lng. 82 48 48

Dates:

Data:10-29-03 Job :11-10-03



Call	CH#	Туре	Location		D-KM	Azı	FCC	Margin
WKQL	245C*	LIC	Jacksonville	FL	152.15	128.0	165.0	-12.85
WRAKFM	247C*	LIC	Bainbrıdge	GΑ	165.07	271.6	165.0	0.07
WRAKFC	247C	CP	Baınbridge	GΑ	165.10	271.6	165.0	0.10
RADD	245C0	ADD	Jacksonville	FL	152.15	128.0	152.0	0.15
WHLJ	248A	LIC	Statenville	GΆ	38.69	189.2	31.0	7.69
WRDO	245A	LIC	Fıtzgerald	GA	79.86	329.4	72.0	7.86
WWRQFC	300C2	CP	Valdosta	GA	25.65	254.6	15.0	10.65
WYZK	244C2	LIC	Valdosta	GΑ	75.98	243.0	55.0	20.98
WAEV	247C0	LIC	Savannah	GΑ	173.14	53.3	152.0	21.14
WWUF	249A	LIC	Waycross	GΑ	53.50	82.6	31.0	22.50
WKAA	249A	LIC N	Ocilla	GA	66.74	312.4	31.0	35.74
RDEL	249A	DEL	Ocilla	GA	66.74	312.4	31.0	35.74
WWRQFM	300C3	LIC N	Valdosta	GA	56.30	235.5	12.0	44.30
WSKYFM	247C2	LIC	Micanopy	FL	167.29	172.1	106.0	61.29
WSKYFA	247C2	APP N	Micanopy	FL	182.31	164.9	106.0	76.31
WJCLFM	243C*	LIC	Savannah	GΑ	174.10	53.0	95.0	79.10
ALLO.V	243A	VAC	Columbia City	FL	117.41	174.5	31.0	86.41

# EXHIBIT - 2 CLEAR AREA WITH WKQL AS A CO CLASS FACILITY

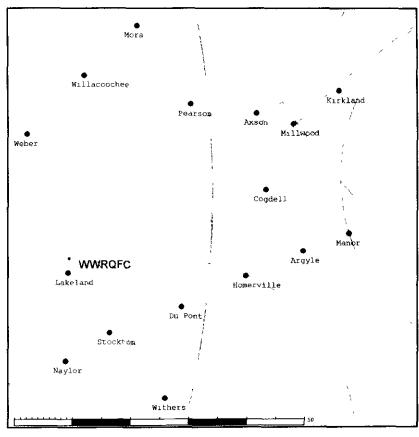
FMCONT(TM) LOCATE STUDY

# Ch 246 A 97.1 MHz

N. Lat. 31 07 27
W. Lng. 82 48 48

Dates:

Data:10-29-03 Job:11-10-03



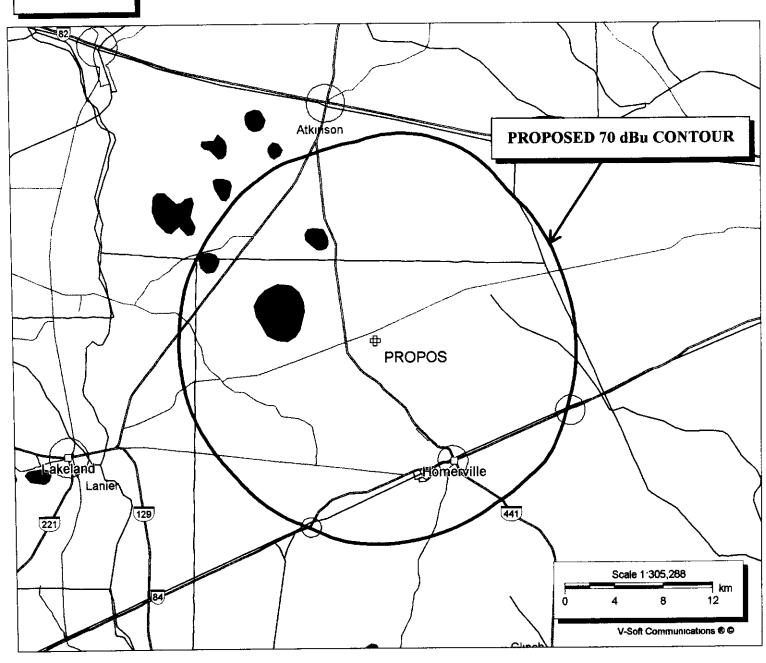
Scale= I 644,531 V-Soft Comm® ©

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WRAKFM	247C*	LIC	Baınbridge	GA	165.07	271.6	165.0	0.07
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WYZK	244C2	LIC	Valdosta	GA	75.98	243.0	55.0	20.98
WAEV	247C0	LIC	Savannah	GA	173.14	53.3	152.0	21.14
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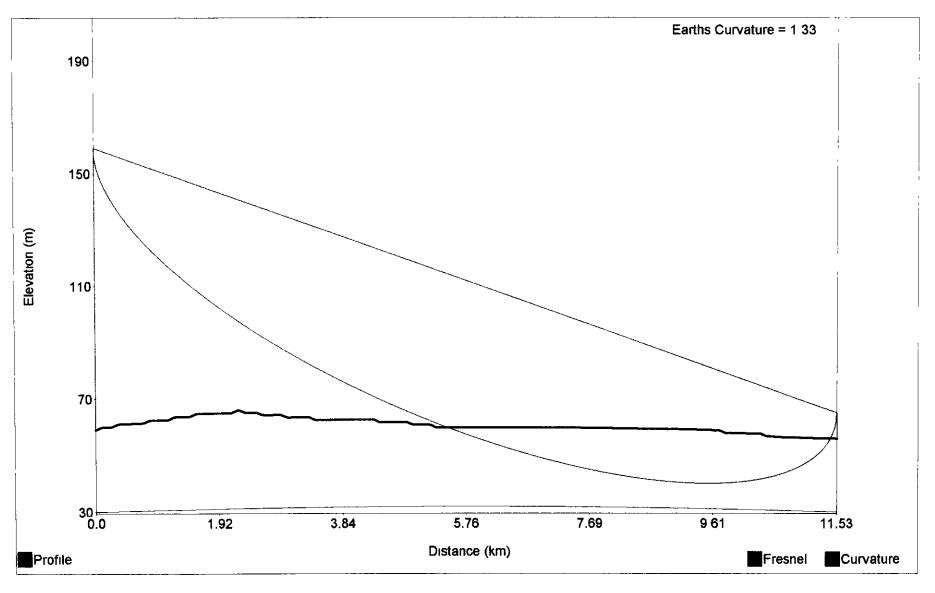
# EXHIBIT - 3

### PROPOS

Latitude 31-07-27 N Longitude 082-48-48 W ERP 6 00 kW Channel 246 Frequency 97 1 MHz AMSL Height 159 02 m Elevation 59 12 m Horiz Pattern Omni Vert Pattern No Prop Model FCC



# **EXHIBIT - 4 -- LINE OF SIGHT TO HOMERVILLE**



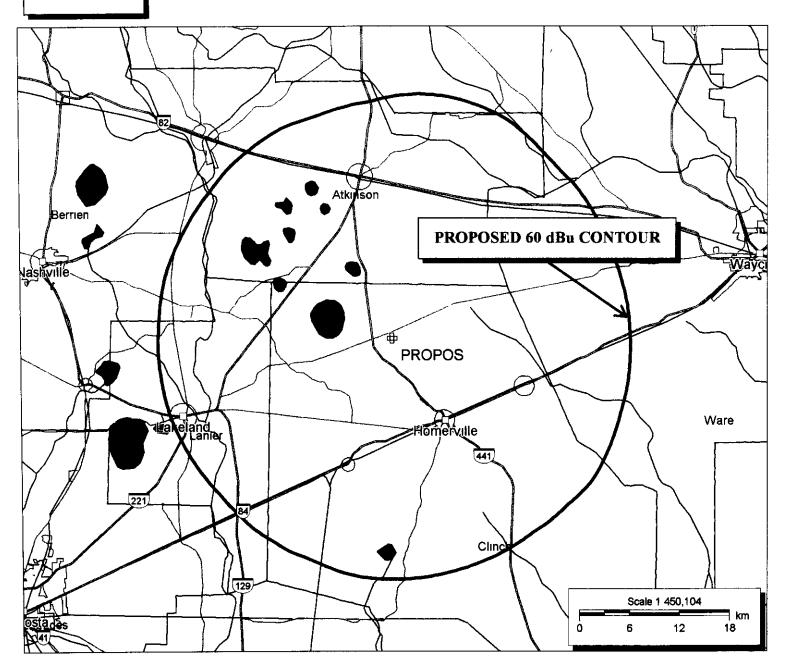
Starting Latitude 31-07-27 N Starting Longitude 082-48-48 W End Latitude 31-02-11.99 N End Longitude. 082-44-53 27 W Distance 11 53 km Bearing, 147 31 deg

Transmitter Height (AG) = 99 9 m Receiver Height (AG) = 91 m Transmitter Elevation = 59 1 m Receiver Elevation = 56 0 m Frequency = 97 1 MHz Fresnel Zone: 0 6

# **EXHIBIT - 5**

# **PROPOS** Latitude 31-07-27 N ERP 600 kW

Longitude 082-48-48 W Channel 246 Frequency 97 1 MHz AMSL Height 159 02 m Elevation 59 12 m Horiz Pattern Omni Vert Pattern No Prop Model FCC



#### EXHIBIT - 5A

Contour Parameters: Type: FCC Contour

F(50-50) Cutoff: 60.00 dBu

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft US 3 Arc-Second Database Secondary Terrain: V-Soft 30 Second US Database

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#### Transmitter Information:

Call Letters: PROPOS Latitude: 31-07-27 N Longitude: 082-48-48 W

ERP: 6.00 kW Channel: 246

Frequency: 97.1 MHz AMSL Height: 159.02 m Elevation: 59.12 m

Horiz. Antenna Pattern: Omni Vert. Elevation Pattern: No

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Total Population Within Contour: 17,699
Total Housing Units Within Contour: 7,341
Total Area Within Contour: 2526.40 sq. km

# F© Federal Communications Commission

Mass Media Bureau

Call Sign Desk - Query

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Call Sign WKQL is not available

Fac ID	Call Sign	Service	City	State	Effective Date	Assigned To
53590	WKQL	FM	JACKSONVILLE	FL		COX RADIO, INC

Our records contain the following address(es) for above licensee(s)

CALL S	IGN	WKQL				
LICENS	EE	COX RADIO, INC				
MAILIN	G ADDRESS	909 HOGAN RD				
CONTINUED ADDRESS						
CITY	JACKSONVILLE		STATE	FL	ZIP	32216-

